

**REMARKS**

Claims 1, 2, 5 and 6 are pending in this application. By this Amendment, claims 1 and 5 are amended to replace the term "introduction holes" with "through holes." No new matter has been added. Reconsideration is respectfully requested in view of the above amendments and the following remarks.

**I. Objection to the Drawings**

The Office Action objects to the drawings because "introduction holes" are not shown. "Introduction holes" have been replaced with "through holes" and are shown, for example, in Fig. 2, as reference 18a. Accordingly, withdrawal of the objection to the drawings is respectfully requested.

**II. The Claims Define Patentable Subject Matter**

The Office Action rejects claims 1, 2, 5 and 6 under 35 U.S.C. §103(a) over Hara (U.S. Patent No. 5,648,276) in view of Babayan (U.S. Patent Application Publication No. 2002/0129902) and Goodyear (U.S. Patent No. 5,532,190). The rejection is respectfully traversed.

Babayan does not disclose or suggest that each of through holes of a lower plate is designed to pass radicals only to a film deposition chamber, as recited in independent claim 1, and similarly recited in independent claim 5

The Office Action continues to assert that Babayan discloses each of through holes of a lower plate is designed to pass the radicals only to the film deposition chamber. However, Babayan does not disclose this feature because Babayan discloses a technical idea that is totally different from that of the claimed invention. Specifically, in Babayan, the rising pressure of plasma atmosphere interrupts a movement of charged particles (ions and so forth), as evidenced in paragraph [0039], where the pressure of the plasma atmosphere is 10 Torr to 5000 Torr and the mean free path in the pressure range is 0.5  $\mu\text{m}$  to 10  $\mu\text{m}$ . Thus, after the

charged particle makes collision with the electrons, it is almost always neutralized. In summary, the interruption of arrival of charged particles at the substrate can be realized by raising the pressure of the plasma atmosphere.

Moreover, as disclosed in paragraph [0047], the spacing of the electrodes is typically between 0.1 and 20 mm. This spacing is longer than the above-mentioned mean free path. Thus, Babayan cannot operate in the manner as recited in the claimed invention.

Equally important, the Office Action continues to assert that Babayan's members or components 26 and 28 are electrically conductive upper electrodes. See page 4 of the Office Action. However, this is not correct. Babayan clearly states that the members 26 and 28 are merely two perforated sheets. See paragraph [0042]. Nowhere does Babayan disclose that members 26 and 28 are electrodes. Therefore, Babayan does not provide for the teaching, suggestion or motivation that members 26 and 28 are electrodes. Thus, Babayan does not disclose or suggest the claimed invention.

Because Babayan does not disclose or suggest each of the through holes of the lower plate is designed to pass the radicals only to the film deposition chamber, it follows that the combination of Babayan and Goodyear does not render obvious for one of ordinary skill in the art to arrive at the claimed invention. Specifically, the Office Action, at page 4, asserts that Goodyear disclose "perforated gas feeding electrode." However, Babayan does not provide technical disclosure of selectively introducing radicals into film deposition section by making the radicals pass through the through holes. Thus, it is not possible for one skilled in the art to derive at the claimed invention based on the disclosure of Babayan and Goodyear.

Therefore, independent claims 1 and 5 define patentable subject matter. Claims 2 and 6 depend from the respective independent claims, and therefore also define patentable subject matter as well as for the other features they recite. Accordingly, withdrawal of the rejection under 35 U.S.C. §103(a) is respectfully requested.

**III. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1, 2, 5 and 6 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

  
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